

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>FIELDWOOD ENERGY III LLC, et al.,</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
<b>Post-Effective Date Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>
	§	<b>Re: ECF No. 2344</b>

**CERTIFICATE OF NO OBJECTION TO  
MOTION OF PLAN ADMINISTRATOR FOR ENTRY OF ORDER ESTABLISHING  
DEADLINE FOR FILING REQUESTS FOR PAYMENT OF ADMINISTRATIVE  
EXPENSE CLAIMS AND PROCEDURES RELATING THERETO AND APPROVING  
FORM AND MANNER OF NOTICE THEREOF**

1. On January 25, 2022, the Plan Administrator (the “**Plan Administrator**”), appointed pursuant to the *Modified Eighth Amended Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors* [ECF No. 2008], filed the *Motion of Plan Administrator for Entry of Order Establishing Deadline for Filing Requests for Payment of Administrative Expense Claims and Procedures Relating Thereto and Approving Form and Manner of Notice Thereof* [ECF No. 2344] (the “**Motion**”). Objections to the Motion were required to be filed and served by February 15, 2022 (the “**Objection Deadline**”).

---

<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “**Post-Effective Date FWE I Subsidiaries**”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

2. In accordance with paragraph 44 of the *Procedures for Complex Cases in the Southern District of Texas* (effective August 1, 2021), the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) the Objection Deadline has passed, (ii) the undersigned counsel is unaware of any objection to the Motion, and (iii) the undersigned counsel has reviewed the Court's docket and no objection or response to the Motion appears thereon.

3. Therefore, the Plan Administrator respectfully requests entry of the proposed order, attached hereto as **Exhibit A** (the “**Revised Proposed Order**”). A redline of the Revised Proposed Order against the version filed with the Motion is attached hereto as **Exhibit B**.

Dated: February 16, 2022  
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez  
WEIL, GOTSHAL & MANGES LLP  
Alfredo R. Pérez (15776275)  
Clifford W. Carlson (24090024)  
700 Louisiana Street, Suite 1700  
Houston, Texas 77002  
Telephone: (713) 546-5000  
Facsimile: (713) 224-9511  
Email: Alfredo.Perez@weil.com  
Clifford.Carlson@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP  
Matthew S. Barr (admitted *pro hac vice*)  
Jessica Liou (admitted *pro hac vice*)  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Email: Matt.Barr@weil.com  
Jessica.Liou@weil.com

*Attorneys for the Plan Administrator and  
certain Post-Effective Date Debtors*

**Certificate of Service**

I hereby certify that on February 16, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ *Alfredo R. Pérez*  
Alfredo R. Pérez